

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

NOTICE OF LIEN PERFECTION PURSUANT TO 11 USC § 546(b)(2)

LIEN HOLDER: Geiger Brothers, Inc.

DEBTOR: Big Lots Stores, LLC

COLLATERAL: Real property at 300 Phillipi Road, Columbus, Ohio 43228

LIEN PERFECTED: Attached hereto and incorporated by reference herein is a true and correct copy of the mechanic's lien recorded in the Franklin County, Ohio, property records as described in **Exhibit A**.

Geiger Brothers, Inc. ("Geiger"), by and through its counsel, hereby provides, pursuant to 11 U.S.C. § 546(b)(2), notice of the perfection of its mechanic's lien, and states as follows:

1. Geiger is a corporation organized under the laws of the State of Ohio and maintains its principal place of business at 317 Ralph Street, Jackson, Ohio 45640.

2. Geiger provided certain services, labor, and materials (the "Geiger Services") to Big Lots Stores, LLC (the "Debtor") for the improvement, renovations, and/or alteration of real

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

property located at 300 Phillipi Road, Columbus, Ohio 43228 (the “Property”). The Property is or was owned by BIGCOOH002, LLC, and is or was leased by the Debtor.

3. The first date on which Geiger provided the Geiger Services to the Debtor was December 11, 2023, and the last date on which Geiger provided the Geiger Services to the Debtor was August 15, 2024.

4. The total amount of the Geiger Services provided to the Debtor, for which payment is outstanding, is \$545,400.

5. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law requires the seizure of property or the commencement of an action as a condition to perfecting a lien, and such property has not been seized or such action has not been commenced prior to the filing of a bankruptcy petition, the claimant may file a notice with the Bankruptcy Court to perfect the lien.

6. Pursuant to section 546(b)(2) of the Bankruptcy Code, Geiger hereby provides notice to the Debtor, Debtor’s counsel, the Office of the United States Trustee for the District of Delaware, Debtor’s secured lenders, the owners of the Property, and to all others interested parties of Geiger’s rights as a perfected lienholder in the Property.

7. In accordance with the laws of the State of Ohio, Geiger filed a Mechanic’s Lien in the real property records in Franklin County, Ohio. A true and correct copy of the Mechanic’s Lien is attached hereto as Exhibit A.

8. The filing of this notice shall not be deemed to be waiver of Geiger’s rights to seek relief from the automatic stay imposed by section 362 of the Bankruptcy Code to foreclose its lien and/or any other rights or defenses.

9. The filing of this notice shall further not be construed as an admission that such filing is required under the Bankruptcy Code, applicable Ohio law, or any other applicable law. Additionally, Geiger hereby makes no admission of fact or law and asserts that its lien is senior to and effective against entities that may have previously acquired rights in the Property.

10. Geiger reserves the right to amend and/or modify this notice.

Dated: September 24, 2024
Wilmington, Delaware

/s/ Katharina Earle
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